

REMARKS/ARGUMENTS

The present application was originally filed with claims 1-52. By this Amendment, the Applicant has canceled all of claims 1-52, without prejudice or disclaimer, and has added new claims 53-90. No new matter has been added. Accordingly, claims 53-90 are now pending in the present application, and reconsideration of the application in view of these claims is respectfully requested.

I. REJECTIONS UNDER 35 U.S.C. §102

The Examiner has rejected claims 1-48 50 and 52 under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent Application 2001/0042010 to Hassell. The Applicant has canceled originally filed claims 1-52 and is submitting new claims 53-90, which includes independent claims 53 and 72. The Applicant respectfully asserts that Hassell does not disclose each and every element of new claims 53 and 72.

Among other things, independent claim 53 recites receiving first and second virtual documents from different first and second corresponding sources, where the first and second documents are stored in a network database and associated with a consumer and at least one enterprise. In contrast, Hassell does not disclose receiving and storing first and second virtual documents from different sources. Instead, Hassell provides all coupons to its user through a single source. In fact, Hassell expressly teaches against the use of different sources for its virtual coupons:

[0018] The problem and shortcomings in the art are addressed by providing a consumer friendly click-through metric that does not require the person to actually leave the site they are currently browsing.

Hassell application; ¶0018 (emphasis added). As a result, Hassell does not anticipate independent claim 53. In addition, new independent claim 72 recites similar limitations, and thus Hassell also does not anticipate claim 72.

For at least these reasons, Hassell does not anticipate new independent claims 53 and 69. Thus, claims 53 and 72 are not obvious in view of Hassell, and nor are the claims that depend from these claims. Accordingly, the Applicants respectfully request that the Examiner withdraw the rejections based on Hassell.

The Examiner has also rejected claims 1-5, 8, 10-13, 16-19, 22, 24-26, 46 and 48-51 under 35 U.S.C. §102(b) as allegedly anticipated by U.S. Patent 6,009,411 to Kepecs. As discussed above, the Applicant has canceled originally filed claims 1-52 and is submitting new claims 53-90, which includes independent claims 53 and 72. The Applicant respectfully asserts that Kepecs also does not disclose each and every element of claims 53 and 72.

Similar to Hassell, the system in Kepecs also discloses a single source for providing coupon choices to consumers, and then associating the coupons with the consumer once selected by the consumer. Specifically, Kepecs states:

FIG. 1 illustrates the general interconnection of consumers to the Discount Administration Process (DAP) by which the consumers receive advertising and discount information and make their selection of the "electronic discounts." The consumers use their computers 10 for connection to the computer 11 of the DAP through the Internet.

Kepecs patent; col. 4, lns. 30-36 (emphasis added). In contrast, independent claims 53 and 72 recite receiving first and second virtual documents from different first and second corresponding sources, where the first and second documents are stored in a network database and associated with a consumer and at least one enterprise.

For at least these reasons, Kepecs also does not anticipate new independent claims 53 and 72. Thus, claims 53 and 72 are not obvious in view of Kepecs, and nor are the claims that depend from these claims. Accordingly, the Applicants respectfully request that the Examiner withdraw the rejections based on Kepecs.

II. REJECTIONS UNDER 35 U.S.C. §103

The Examiner has also rejected dependent claims 49 and 51 under 35 U.S.C. §103(a) as allegedly obvious and thus unpatentable over Hassell. As mentioned above, these claims have been canceled, thus rendering this rejection moot.

III. CONCLUSION

Applicants respectfully submit that pending claims 53-90 are in condition for allowance, and, therefore, a Notice of Allowability of the pending claims is respectfully requested. The Examiner is requested to contact the undersigned Attorney of Record if such would expedite the prosecution of the present application. The presesent Amendment is being submitted with the required three-month Petition for Extension of Time fee. If the Director determines that additional fees are due, or an overpayment has occurred, the Director is hereby authorized to charge or credit Deposit Account No. 13-0480 for any such fees, referencing the Attorney Docket Number specified herein.

Respectfully submitted,

/James H. Ortega/

Date: October 3, 2007

James H. Ortega, Reg. No. 50,554
BAKER & MCKENZIE LLP
2001 Ross Avenue, Suite 2300
Dallas, TX 75201
Tel: (214) 978-3058